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 GEOFFREY RICHARDS
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8 UNITED STATES BANKRUPTCY COURT
 9 EASTERN DISTRICT OF CALIFORNIA

10 IN RE:

11
 12 LINDA L. BEDROSIAN-WHEELER,

13 Debtor.
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NO: 09-31872-C-7

DC No.: SLF 2

CHAPTER 7 TRUSTEE
 GEOFFREY RICHARDS' VERIFIED
 APPLICATION FOR ORDER
 AUTHORIZING EMPLOYMENT OF
 ASSET RECOVERY SPECIALIST
 JAY BLOCKSOM OF BLOCKSOM &
 BLOCKSOM, LLC

Date: January 7, 2014

Time: 9:30 a.m.

Place: Department C

The Honorable Christopher M. Klein

1 Chapter 7 Trustee Geoffrey Richards seeks authorization to employ asset
2 recovery specialist Jay Blocksom, of Blocksom & Blocksom LLC, who is assisting the Trustee in
3 locating and recovering undisclosed probate funds that are property of the estate.

4 Mr. Richards respectfully represents as follows:

5 1. The Debtor filed this case on June 10, 2009, and Geoffrey Richards was
6 appointed as the Trustee. On October 6, 2009, this case was closed.

7 2. In late October 2013, Mr. Blocksom sent an email to Mr. Richards stating
8 that he had conducted an investigation that revealed an undisclosed governmental agency was
9 holding \$246,906.69 of funds that he believed are property of the estate in this case.

10 Mr. Blocksom's email stated that he would assist Mr. Richards in recovering the funds, and that
11 under his standard agreement for these types of matters he receives 25 percent of the gross
12 recovery. (Ex. A).

13 3. In response, Mr. Richards telephoned Mr. Blocksom to make further inquiry
14 about the facts and the funds. He also inquired as to which agency was holding the funds and
15 why they were holding the funds. Mr. Blocksom was willing to provide this information based on
16 a reasonable assurance that he would be compensated for the work he had done to discover
17 the asset and report it to Mr. Richards.

18 4. Mr. Blocksom then provided to Mr. Richards' counsel a page from the
19 Placer County Treasurer – Tax Collector website, which confirms the County is holding
20 \$246,906.69 in unclaimed funds from the estate of Thelma Louise Bedrosian (the "Probate
21 Funds"), and that Debtor Linda Bedrosian-Wheeler is the heir to the Probate Funds. (Ex. B).

22 5. Mr. Richards asked Mr. Blocksom for additional information to confirm that
23 the Linda Bedrosian-Wheeler identified on the Placer County Treasurer – Tax Collector website
24 is the same as person as the Debtor. Mr. Blocksom provided the information, which showed
25 Debtor Linda Bedrosian-Wheeler is the beneficiary of the probate estate of Thelma Louise
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1 Bedrosian, who died on April 18, 2009, before the Debtor filed this case. (Ex. C). The Debtor did
2 not identify her interest in her mother's estate on her schedules.

3 6. On November 14, 2013, the Court granted the U.S. Trustee's motion to
4 reopen the case for the purpose of administering the Probate Funds. (Docket No. 27).
5 Mr. Richards was reappointed trustee in the reopened case. (Docket No. 28).

6 7. Mr. Richards is taking steps to recover the Probate funds from the Placer
7 County Treasurer – Tax Collector.

8 8. Mr. Richards wishes to employ Mr. Blocksom so that he may be
9 compensated for his work in locating the Probate Funds and providing information to
10 Mr. Richards so that Mr. Richards can attempt to recover the Probate Funds.

11 9. Mr. Blocksom's proposed fee is 25 percent of the gross recovery of the
12 Probate Funds, subject to approval by the Bankruptcy Court. If there is no recovery,
13 Mr. Blocksom will not receive any fees. Mr. Blocksom will be responsible for all costs he incurs.
14 (Blocksom Decl., ¶ 2).

15 10. Mr. Blocksom formed Blocksom & Blocksom LLC in 2009 as an asset
16 recovery firm. Mr. Blocksom has substantial experience in auditing county, state, federal and
17 corporate entities to locate unclaimed assets and monies and recover them. Mr. Blocksom
18 reviews public records, court documents, deeds, wills, bankruptcy filings, obituaries, and
19 databases to locate unclaimed funds and potential claimants. (Blocksom Decl., ¶ 3, Ex. D).

20 11. If it were not for the work that Mr. Blocksom did in locating the Probate
21 Funds and advising Mr. Richards about them, the estate would not have known about the
22 Probate Funds and therefore would not be able to recover the Probate Funds.

23 12. Mr. Richards believes that employing Mr. Blocksom is in the best interest of
24 the estate and that the Court should approve it.

25 13. Bankruptcy Code Section 327(a) authorizes the Trustee, with Court
26 approval, to employ a professional to assist the trustee in carrying out his duties if such

1 professional does not represent or hold any interest adverse to the debtor or to the estate with
2 respect to the matter on which such professional is to be employed.

3 14. Mr. Blocksom has not been retained for any prepetition services on behalf
4 of the Debtor or the Trustee, and he has not received retainers or advanced fees. (Blocksom
5 Decl., ¶ 4).

6 15. Mr. Blocksom does not hold any interest adverse to the Debtor or to the
7 estate and:

8 (i) is not a creditor, an equity security holder, or an insider of the Debtor;

9 (ii) is not and was not, within two years before the date of the filing of the
10 petition, a director, officer, or employee of the Debtor;

11 (iii) does not have an interest materially adverse to the interest of
12 Trustee, the estate, or any class of creditors or equity security holders, by reason of any direct or
13 indirect relationship to, connection with, or interest in, the Debtor or Trustee; and

14 (iv) does not have any connection with the Debtor, Trustee, the United
15 States Trustee, or any person employed in the Office of the United States Trustee. (Blocksom
16 Decl., ¶ 5).

17 WHEREFORE, Mr. Richards respectfully requests that the Court authorize him to
18 employ Mr. Blocksom according to the terms in this application and that it grant such other and
19 further relief as is appropriate.

20 Dated: December 9, 2013

THE SUNTAG LAW FIRM
A Professional Corporation

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22 BY: /s/ Loris L. Bakken
23 LORIS L. BAKKEN
24 Attorneys for Chapter 7 Trustee
25 GEOFFREY RICHARDS
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VERIFICATION

I, GEOFFREY RICHARDS, am the Trustee in this case. I have read the above application and verified its accuracy and I approve it.

I declare under penalty of perjury of the laws of the United States that the foregoing is true and correct.

Executed on December 6, 2013, at Orinda, California.



GEOFFREY RICHARDS